

Fill in this information to identify the case

Debtor 1 Jason W. Homa

Debtor 2 Candice L. Homa  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of PENNSYLVANIA  
(State)

Case number 19-21818

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: KeyBank, NA, s/b/m First Niagara Bank, NA

Court claim no. (if known):

Last 4 digits of any number you use to identify the debtor's account: 7137

4-2

Property address: 209 Underwood Ave  
Number Street

Elizabeth PA 15037

City

State

Zip Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

    /    /      
MM/DD/YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$1,004.20

b. Total fees, charges, expenses, escrow, and costs outstanding:

(b) \$0.00

c. Total. Add lines a and b.

(c) \$1,004.20

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

04/15/2024\*  
MM/DD/YYYY

\*The Trustee sent excess funds during the life of the bankruptcy. The Trustee's accounting appears to have applied the excess funds to monthly payments; however, Creditor applied the excess funds to the principal balance. Creditor will compare records with the Trustee.

Debtor 1 Jason W. Homa  
First Name Middle Name Last Name

Case number (if known) 19-21818

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/Stephen R. Franks  
Signature

Date 08/27/2024

Print: Stephen R. Franks

Title Attorneys for Creditor

Company Manley Deas Kochalski LLC

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611

Email amps@manleydeas.com

**Exhibit B: Schedule of Amounts Outstanding Post-Petition Claim**

Description		Dates incurred	Amount	
1.	Late charges	_____	(1)	\$ _____
2.	Non-sufficient funds (NSF) fees	_____	(2)	\$ _____
3.	Attorney's fees	_____	(3)	\$ _____
4.	Filing fees and court costs	_____	(4)	\$ _____
5.	Advertisement costs	_____	(5)	\$ _____
6.	Sheriff/auctioneer fees	_____	(6)	\$ _____
7.	Title costs	_____	(7)	\$ _____
8.	Recording fees	_____	(8)	\$ _____
9.	Appraisal/broker's price opinion fees	_____	(9)	\$ _____
10.	Property inspection fees	_____	(10)	\$ _____
11.	Tax advances (non-escrow)	_____	(11)	\$ _____
12.	Insurance advances (non-escrow)	_____	(12)	\$ _____
13.	Escrow shortage or deficiency (Do not include amounts that are part of any installment payment listed in Part 3.)	_____	(13)	\$ _____
14.	Property preservation expenses. Specify: _____	_____	(14)	\$ _____
15.	5 payments at \$200.84 each.	4/15/24 - 8/15/24	(15)	\$ 1,004.20
16.	Other. Specify: _____	_____	(16)	\$ _____
Total postpetition fees, expenses, and charges. Add all of the amounts listed above.			(17)	\$ 1,004.20

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 19-21818**  
**Jason W. Homa** : **Chapter 13**  
**Candice L. Homa** : **Judge Jeffery A. Deller**  
: \* \* \* \* \*

**Debtor(s)**

<b>KeyBank, NA, s/b/m First Niagara Bank, NA</b>	<b>:</b>	<b>Related Document #</b>
	<b>:</b>	

**Movant,**

**VS**

**Jason W. Homa**  
**Candice L. Homa**  
**Ronda J. Winnecour**

## Respondents.

**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date) 08/27/2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 08/27/2024

By: /s/Stephen R. Franks  
Signature  
Stephen R. Franks, Esquire  
Typed Name  
P.O. Box 165028, Columbus, OH 43216-5028  
Address  
614-220-5611  
Phone No.  
0075345  
List Bar I.D. and State of Admission

Stephen R. Franks, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219, cmecf@chapter13trusteedpa.com (notified by ecf)

Dennis J. Spyra, Attorney for Debtor, 1711 Lincoln Way, White Oak, PA 15131, dennis@spyrallawoffice.com (notified by ecf)

Jason W. Homa and Candice L. Homa, Debtor, 209 Underwood Ave., Elizabeth, PA 15037 (notified by regular US Mail)

Bank of America, Party of Interest, P.O. Box 31785, Tampa, FL 33631-3785 (notified by regular US Mail)

Name:	Jason & Candice Homa
Case Number:	19-21818
Loan Number:	

				Pre- Petition Balances:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Transaction Description	Payment Due Date	Amount Due	Transaction Date	Received Amount	Principal	Interest	Escrow	Fee	Late Charge	Misc	Trustee Suspense	Debtor Suspense	PP PMT SUSP
Pre-Petition RCVD:				\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Post-Petition RCVD:				\$ 18,053.53	\$ 11,907.60	\$ 6,145.93	\$ -	\$ -	\$ -	\$ -			
Bill	5/15/2019	\$ 325.47											
Post-Petition PMT			5/21/2019	\$ 325.47	\$ 147.23	\$ 178.24							
Bill	6/15/2019	\$ 327.20											
Post-Petition PMT			6/17/2019	\$ 327.20	\$ 175.74	\$ 151.46							
Post-Petition PMT			7/11/2019	\$ 322.27	\$ 178.97	\$ 143.30							
Bill	7/15/2019	\$ 322.27											
Post-Petition PMT			8/8/2019	\$ 258.44	\$ 183.18	\$ 75.26							
Bill	8/15/2019	\$ 258.44											
Post-Petition PMT			9/3/2019	\$ 258.46	\$ 183.96	\$ 74.50							
Bill	9/15/2019	\$ 258.46											
Post-Petition PMT			10/7/2019	\$ 258.70	\$ 187.60	\$ 71.10							
Bill	10/15/2019	\$ 258.70											
Post-Petition PMT			11/12/2019	\$ 258.46	\$ 185.74	\$ 72.72							
Bill	11/15/2019	\$ 258.46											
Post-Petition PMT			12/10/2019	\$ 258.70	\$ 188.90	\$ 69.80							
Bill	12/15/2019	\$ 258.70											
Post-Petition PMT			1/7/2020	\$ 258.70	\$ 187.62	\$ 71.08							
Bill	1/15/2020	\$ 258.70											
Bill	2/15/2020	\$ 258.46											
Bill	3/15/2020	\$ 258.70											
Post-Petition PMT			3/26/2020	\$ 265.36	\$ 188.37	\$ 76.99							
Bill	4/15/2020	\$ 258.70											
Post-Petition PMT			4/17/2020	\$ 115.24	\$ 115.24	\$ -							
Post-Petition PMT			5/8/2020	\$ 263.65	\$ 193.61	\$ 70.04							
Bill	5/15/2020	\$ 258.70											
Post-Petition PMT			6/1/2020	\$ 511.08	\$ 381.21	\$ 129.87							
Bill	6/15/2020	\$ 258.46											
Post-Petition PMT			7/1/2020	\$ 228.57	\$ 165.73	\$ 62.84							
Bill	7/15/2020	\$ 257.98											
Post-Petition PMT			8/5/2020	\$ 358.43	\$ 226.90	\$ 131.53							
Bill	8/15/2020	\$ 181.75											
Bill	9/15/2020	\$ 314.47											
Post-Petition PMT to PP PMT Suspense			9/21/2020	\$ 243.08							\$ 243.08		
PMT from PP PMT Suspense			9/29/2020	\$ -	\$ 181.75	\$ 61.33					\$ (243.08)		
Post-Petition PMT to PP PMT Suspense			10/14/2020	\$ 263.06							\$ 263.06		
Bill	10/15/2020	\$ 302.85											
PMT from PP PMT Suspense			10/23/2020	\$ -	\$ 189.60	\$ 73.46					\$ (263.06)		
Post-Petition PMT to PP PMT Suspense			11/4/2020	\$ 262.96							\$ 262.96		
PMT from PP PMT Suspense			11/6/2020	\$ -	\$ 176.86	\$ 86.10					\$ (262.96)		
Bill	11/15/2020	\$ 306.66											

Post-Petition PMT to PP PMT Suspense			12/3/2020	\$	334.75						\$	334.75		
PMT from PP PMT Suspense			12/9/2020	\$	-	\$	229.06	\$	105.69		\$	(334.75)		
Bill	12/15/2020	\$	216.98											
Post-Petition PMT			1/11/2021	\$	151.25	\$	32.91	\$	118.34					
Bill	1/15/2021	\$	200.84											
Post-Petition PMT			2/10/2021	\$	371.49	\$	137.94	\$	233.55					
Bill	2/15/2021	\$	200.84											
Post-Petition PMT			3/2/2021	\$	259.92	\$	113.10	\$	146.82					
Bill	3/15/2021	\$	200.84											
Post-Petition PMT			4/7/2021	\$	368.55	\$	252.54	\$	116.01					
Bill	4/15/2021	\$	200.84											
Post-Petition PMT			4/30/2021	\$	258.06	\$	122.22	\$	135.84					
Bill	5/15/2021	\$	200.84											
Post-Petition PMT			6/3/2021	\$	326.65	\$	203.97	\$	122.68					
Bill	6/15/2021	\$	200.84											
Post-Petition PMT			7/2/2021	\$	256.59	\$	130.66	\$	125.93					
Bill	7/15/2021	\$	200.84											
Post-Petition PMT			7/30/2021	\$	236.39	\$	115.15	\$	121.24					
Bill	8/15/2021	\$	200.84											
Post-Petition PMT			8/31/2021	\$	407.28	\$	286.56	\$	120.72					
Bill	9/15/2021	\$	200.84											
Post-Petition PMT			9/28/2021	\$	285.97	\$	165.25	\$	120.72					
Bill	10/15/2021	\$	200.84											
Post-Petition PMT			11/1/2021	\$	348.04	\$	229.23	\$	118.81					
Bill	11/15/2021	\$	200.84											
Post-Petition PMT			12/1/2021	\$	172.66	\$	58.79	\$	113.87					
Bill	12/15/2021	\$	200.84											
Post-Petition PMT			12/29/2021	\$	561.80	\$	436.58	\$	125.22					
Bill	1/15/2022	\$	200.84											
Post-Petition PMT			1/28/2022	\$	392.94	\$	273.20	\$	119.74					
Bill	2/15/2022	\$	200.84											
Post-Petition PMT			3/1/2022	\$	181.36	\$	74.48	\$	106.88					
Bill	3/15/2022	\$	200.84											
Post-Petition PMT			3/30/2022	\$	587.72	\$	469.88	\$	117.84					
Bill	4/15/2022	\$	200.84											
Post-Petition PMT			5/3/2022	\$	273.01	\$	156.81	\$	116.20					
Bill	5/15/2022	\$	200.84											
Post-Petition PMT			6/2/2022	\$	413.80	\$	306.03	\$	107.77					
Bill	6/15/2022	\$	200.84											
Post-Petition PMT			7/1/2022	\$	329.01	\$	211.27	\$	117.74					
Bill	7/15/2022	\$	200.84											
Post-Petition PMT			7/29/2022	\$	280.56	\$	171.29	\$	109.27					
Bill	8/15/2022	\$	200.84											
Post-Petition PMT			8/31/2022	\$	425.70	\$	320.85	\$	104.85					
Bill	9/15/2022	\$	200.84											
Post-Petition PMT			10/5/2022	\$	423.57	\$	305.57	\$	118.00					
Bill	10/15/2022	\$	200.84											
Bill	11/15/2022	\$	200.84											
Post-Petition PMT			12/1/2022	\$	468.38	\$	253.16	\$	215.22					
Post-Petition PMT			12/8/2022	\$	280.49	\$	280.49							
Bill	12/15/2022	\$	200.84											
Post-Petition PMT			12/29/2022	\$	297.96	\$	193.84	\$	104.12					
Bill	1/15/2023	\$	200.84											
Post-Petition PMT			2/2/2023	\$	258.70	\$	156.05	\$	102.65					
Bill	2/15/2023	\$	200.84											
Post-Petition PMT			3/1/2023	\$	258.70	\$	149.90	\$	108.80					
Bill	3/15/2023	\$	200.84											
Post-Petition PMT			4/4/2023	\$	258.70	\$	164.17	\$	94.53					

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